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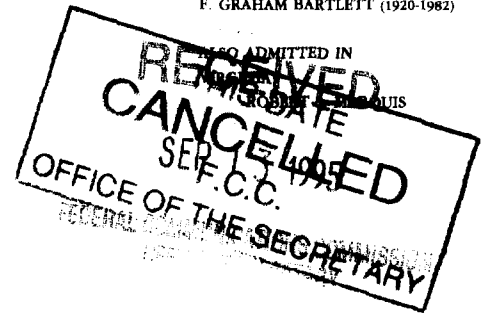
A PROFESSIONAL CORPORATION
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H. H. McCAMPBELL, JR. (1905-1974)
F. GRAHAM BARTLETT (1920-1982)



September 12, 1995

Via Federal Express

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

ATTENTION: Allocations Branch

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SEP 13 1995

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Re: MM Docket No. 95-122
Amendment of FM Table of Allotments
(Lexington and Parker's Crossroads, Tennessee)

Dear Mr. Caton:

On behalf of our client, Crossroads Broadcasting, we submit herewith an original and four copies of its Comments and Counterproposal in the above proceeding.

Also enclosed is an additional copy of the Comments and Counterproposal to be returned to the undersigned in the enclosed postage-paid self-addressed envelope after it has been date-stamped by your office.

Please direct any questions concerning the enclosed to the undersigned. Thank you for your assistance.

Sincerely,

MCCAMPBELL & YOUNG
A Professional Corporation

Robert S. Stone

RSS/cs

Enclosures: As stated

cc: Crossroads Broadcasting (with enclosure)
Dennis P. Corbett, Esq. (with enclosure)

Handwritten: 044

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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SEP 13 1995

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of:

Amendment of Section 73.202(b))	MM Docket No. 95-122
Table of Allotments,)	
FM Broadcast Stations.)	RM No. 8668
(Lexington, Tennessee and)	
Parker's Crossroads, Tennessee))	

To: Chief Allocations Branch
Policy and Rules Division
Mass Media Bureau

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COMMENTS AND COUNTERPROPOSAL OF CROSSROADS BROADCASTING

Crossroads Broadcasting ("Crossroads") by counsel, in response to the Commission's *Notice of Proposed Rule Making*, DA95-1605, released July 26, 1995 ("NPRM") in the above-captioned rule making proceeding, hereby respectfully submits its comments and counterproposal. Crossroads respectfully requests the allotment of Channel 243A to the community of Parker's Crossroads, Tennessee instead of Lexington, Tennessee. In support whereof, the following is shown:

1. The community of Parker's Crossroads is presently without any form of local broadcast transmission service. Although the community is small (1990 population -- 161 persons), it nevertheless more than qualifies as a "community" for FM allotment purposes. Parker's Crossroads is incorporated and lies at the intersection of Interstate 40 and State Route 22 in Henderson County, Tennessee (see attached excerpt from 1995 Rand McNally Road Atlas). The community is managed by a mayor and board of aldermen form of government. Although the city shares water, gas, and electricity with Henderson and surrounding counties and shares

fire and police service with Henderson County, the community maintains a city park, a local post office,¹ and is home to a number of businesses, civic clubs, and churches. Beaver School (grades K-8) is located in Parker's Crossroads. The Crossroads Possum Club and the Beaver Ruritan Club are located in Parker's Crossroads along with an historic Civil War battle tour. The Expressway Church of Christ and the County Line Baptist Church are located in the community. Businesses located in Parker's Crossroads include Cotton Patch Restaurant, Giftland Fireworks, County Store, Best Western Inn, Johnny Shiloh's Restaurant, Texaco Kwik Mart, Antiques Collectibles, Knights Inn, Bailey's Restaurant, Amoco Food Stop, Olive Bros. Grocery & BP, Log Cabin Information Center, Citgo Bull Market, I-Mart, Crossroads Discount Grocery, First Bank Branch Office, Parker's Crossroads Nursery, Parker's Crossroads Campground, and Hwy 22 Salvage Grocery. Thus, although small, Parker's Crossroads qualifies as a community for allotment purposes. *See, Talking Rock, Georgia*. DA95-1728, released August 14, 1995 (FM Channel 261A allotted to community consisting of 62 persons).

2. As set forth in the technical exhibit attached hereto in support of Crossroads's counterproposal, FM Channel 243A may be allotted to the community of Parker's Crossroads in full compliance with all spacing requirements of the Commission while providing for principal community coverage throughout the community. The allotment would not create or exacerbate any shortspacing to existing assignments, vacant allotments, pending applications, or proposed allotments with the exception of the proposal by Floriplex, Inc. ("Floriplex"), Petitioner in the instant proceeding.

¹ Although still called the "Wildersville Post Office", based upon its prior location in the nearby community of Wildersville, Tennessee, the post office has been relocated to the community of Parker's Crossroads.

3. Floriplex suggests that FM Channel 243A be allotted to the community of Lexington, Tennessee (population 5,810). Lexington is already the community of license for WDXL(AM) and WZLT(FM), both full-time aural services.² Thus, Lexington does not qualify for allotment priorities for first full-time aural service, second full-time aural service, or first local service. *See, Revision of FM Policies and Procedures ("FM Priorities")*, 90 FCC 2d 88 (1982). Parker's Crossroads, on the other hand, is presently without local service, thus qualifying for such an allotment priority.

4. Crossroads Broadcasting hereby states its commitment to promptly apply for a construction permit consistent with the allotment of FM Channel 243A to Parker's Crossroads, Tennessee should the instant counterproposal be adopted. Crossroads Broadcasting further states its commitment to prompt construction of broadcast facilities in accordance with the terms of the construction permit issued by the Commission therefor, so that the community of Parker's Crossroads may receive local broadcast service at the earliest possible date.³

WHEREFORE, premises considered. Crossroads Broadcasting respectfully urges the Commission to amend its *Table of FM Allotments* so as to allot FM Channel 243A to the community of Parker's Crossroads, Tennessee.

² Lexington is also the community of license for non-commercial educational WLJT-TV, an affiliate of the Public Broadcasting Service.

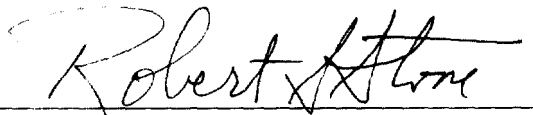
³ Floriplex qualifies its commitment by stating that it has only a "present intention" to apply for FM Channel 243A should the channel be allotted to Lexington.

Dated this 12th day of September, 1995.

Respectfully Submitted,

CROSSROADS BROADCASTING

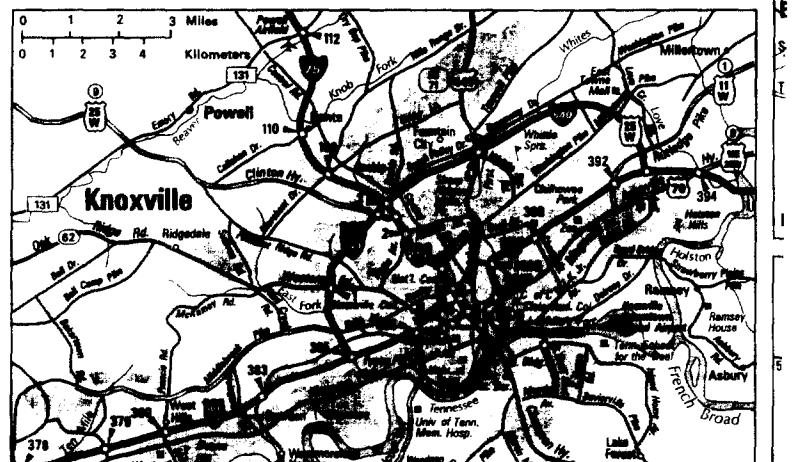
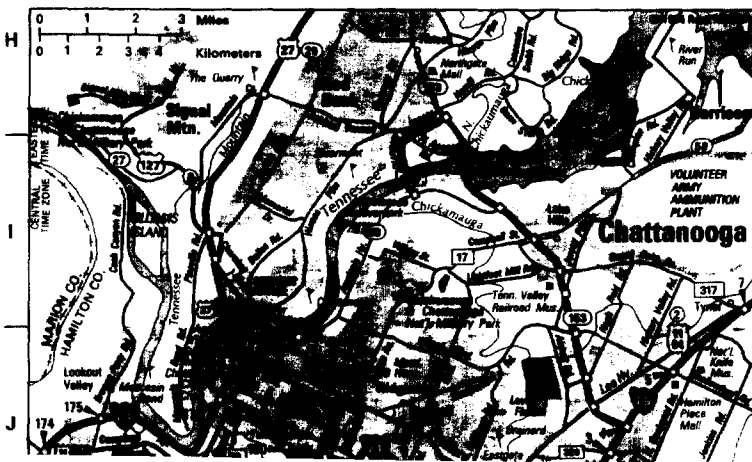
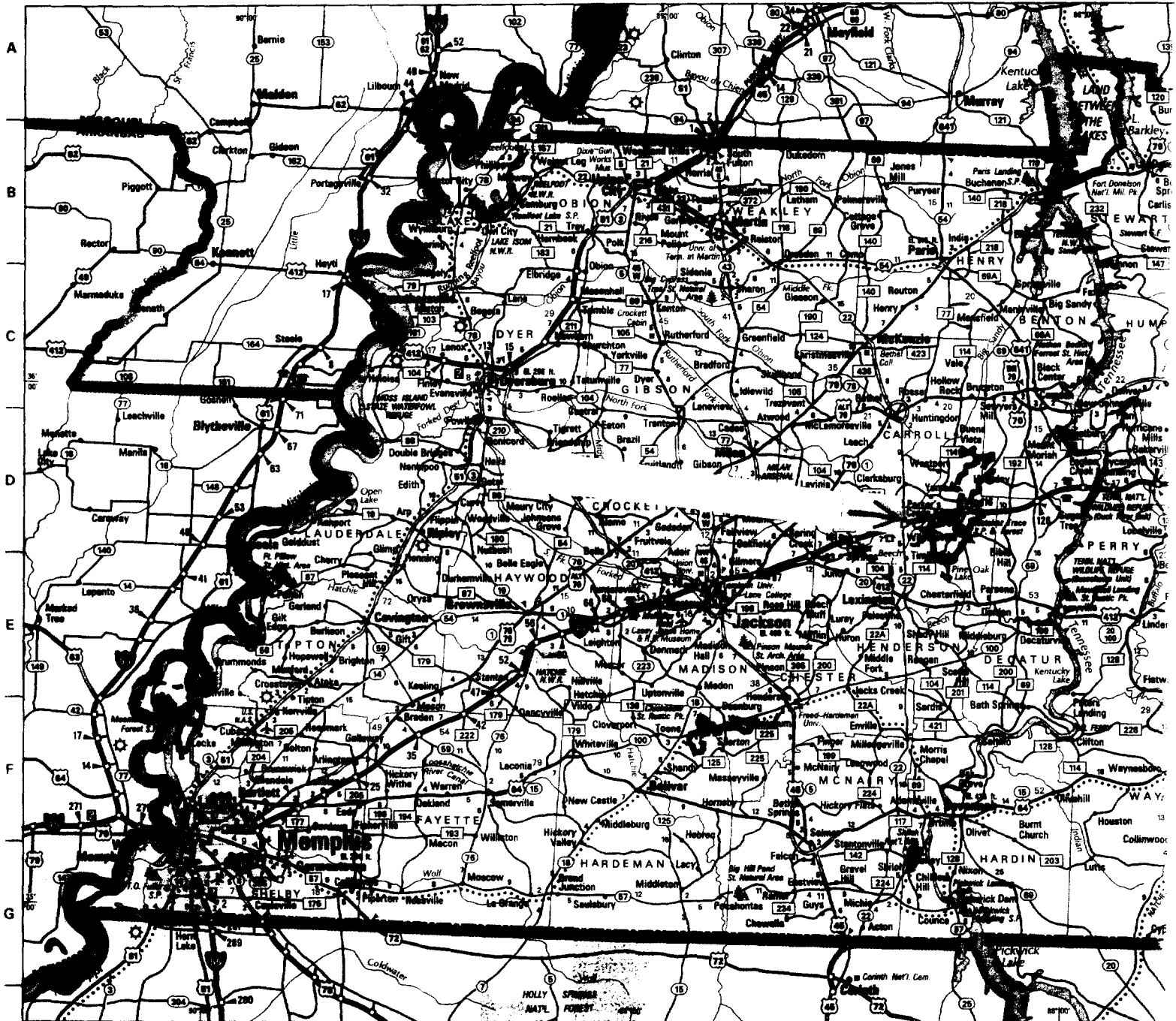
MCCAMPBELL & YOUNG, P.C.
Its Attorneys

By: 
Robert S. Stone

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	Chattanooga	Clarksville	Dyersburg	Fayetteville	Gettysburg	Johnson City	Kingsport	La Follette	Memphis	Nashville	Outpost	Union City	Atlanta, GA	Chattanooga	Clarksville	Dyersburg	Fayetteville
Mileage Between Principal Cities	115	227	173	95	298	93	154	253	221	213	114	151	335	161	128	114	311
	268	336	173	124	174	137	263	129	330	322	223	260	211	270	47	207	139
	413	463	298	174	251	242	390	49	457	446	350	387	73	367	173	334	35
	208	320	93	137	107	242	247	197	314	306	207	244	225	254	90	173	232

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TECHNICAL EXHIBIT

**IN SUPPORT OF
PETITION FOR RULE MAKING
NEW FM - CHANNEL 243A
PARKERS CROSSROADS, TENNESSEE
(COUNTERPROPOSAL TO MM DOCKET NO. 95-122)**

CROSSROADS BROADCASTING

Prepared August 19, 1995

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TECHNICAL EXHIBIT

**IN SUPPORT OF PETITION FOR RULE MAKING
NEW FM - CHANNEL 243A
PARKERS CROSSROADS, TENNESSEE
(COUNTERPROPOSAL TO MM DOCKET NO. 95-122)**

CROSSROADS BROADCASTING

INTRODUCTION

This Technical Exhibit supports the counterproposal of Crossroads Broadcasting, seeking to amend the FM Table of Allotments, Section 73.202(b) of the Rules, by allocating FM Channel 243A to Parkers Crossroads, Tennessee, as that community's first local FM channel. This counterproposal is mutually-exclusive with a proposal to allocate Channel 243A to Lexington, Tennessee (MM Docket No. 95-122). Channel 243A is the only FM channel available for allocation at either community.

ALLOCATION

A study was performed using the computerized *SEARCHFM* frequency search program and the current FCC/NTIS database to determine if Channel 243A could be allocated in compliance

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with the minimum distance separation requirements of Section 73.207(b) of the Commission's Rules. The study included all pertinent co-channel, adjacent-channel and IF separations.

The results of that study indicate that Channel 243A may be allocated to Parkers Crossroads in full compliance with Section 73.207(b), without the imposition of a site-restriction.

The "Useable Area" for Channel 243A is indicated on Exhibit A, attached hereto. The exhibit depicts the required separation limits from all pertinent co-channel and adjacent channel stations and allocations. As indicated, there is ample area in the vicinity of Parkers Crossroads in which to locate a transmitter site. Assuming maximum Class A facilities (6 kw @ 100 meters above average terrain), a transmitter site at any location within the useable area would enable the proposed station to provide adequate city-grade (70 dBu) coverage to the entire city, in full compliance with Section 73.315(a) and (b).

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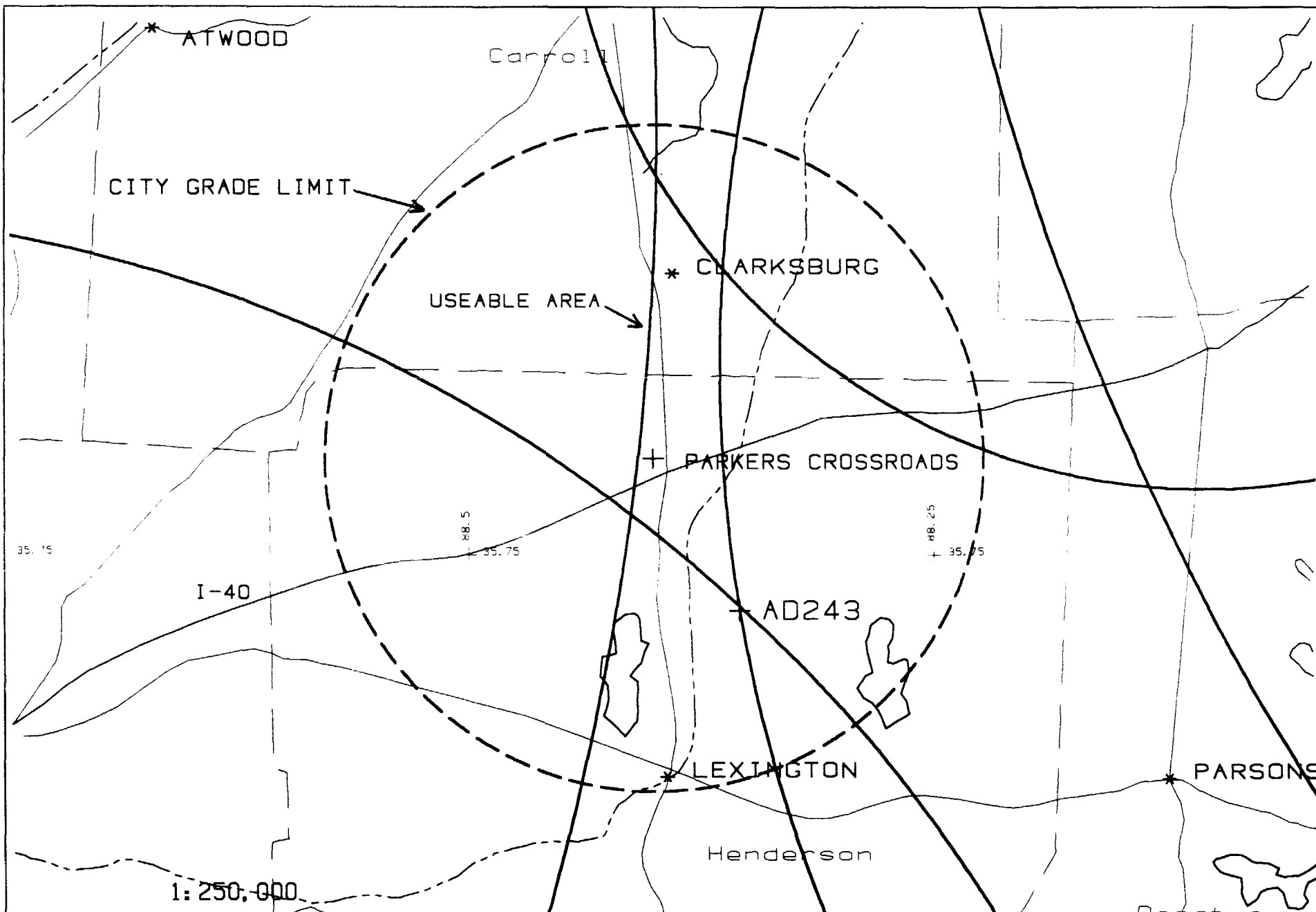
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CONCLUSION

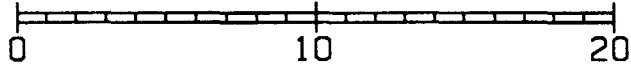
The proposed change in the table of allotments will not create a short-spacing to any existing station, pending application or vacant allotment, and will not require the reallocation of any station, pending application or vacant allotment.

A copy of the separation study for Channel 243A is attached hereto as Exhibit B and made a part of this report (only those stations and channels sufficiently close for concern are noted therein).

###



Scale in km



PARKERS CROSSROADS, TN

N. Lat. 35 47 30

W. Lng. 88 24 00

EXHIBIT B

LGF - 08/95

CONTEMPORARY COMMUNICATIONS
BROADCAST CONSULTANTS

EXHIBIT B

PARKERS CROSSROADS TN
NEW FM "DROP-IN" STUDY

REFERENCE		CLASS = A	DISPLAY DATES
35 47 30 N		Current Spacings	DATA 07-28-95
88 24 00 W			SEARCH 08-18-95
----- Channel 243 - 96.5 MHz -----			

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
AD243	AD 243A	Lexington	TN	8.42	150.2	115.0	-106.58
35 43 33	88 21 13		0.000 kW	0 M			
		Floriplex, Inc.		RM8668	950720		
		Site Restricted 9.0 km Northeast					
KHLS	LI 242C1	Blytheville	AR	133.74	276.3	133.0	0.74
35 55 27	89 52 18	EN	100.000 kW	107 M			
		Sudbury Services, Inc.		BLH861120KA	871216		
DE244	DE 244A	Bolivar	TN	74.81	216.6	72.0	2.81
35 15 00	88 53 28		0.000 kW	0 M			
		Tupelo Communications, Inc.		RM7085	910701		
WMOD	LI 244A	Bolivar	TN	74.81	216.6	72.0	2.81
35 15 00	88 53 28	CN	3.000 kW	91 M			
		West Tennessee Radio Network		BLH6562	881019		
WNKXFM	LI 244A	Centerville	TN	75.37	87.0	72.0	3.37
35 49 39	87 34 02	CN	6.000 kW	91 M			
		Hickman County Broadcasting,		BMLH940502KG	950208		
ALOPEN	AL 240A	Camden	TN	39.82	42.3	31.0	8.82
36 03 25	88 06 10	N	0.000 kW	0 M			
		89-416			921112		
		Effective 11-5-92-Reserved for WRJB Per 89-416					
WRMX.C	CPM 242C1	Murfreesboro	TN	154.63	70.0	133.0	21.63
36 16 05	86 47 16	DCN	53.000 kW	388 M			
		South Central Communications		BMPH931013IA	950613		
AD244	AD 244C1	Pontotoc	MS	162.62	196.1	133.0	29.62
34 23 00	88 53 40		0.000 kW	0 M			
		Tupelo Communications, Inc.		RM7085	910701		
WRAJFM	LI 243C2	Anna	IL	202.40	330.0	166.0	36.40
37 22 16	89 31 52	ZCY	22.500 kW	227 M			
		Union Broadcasting, Inc.		BLH940223KB	950426		
		From Channel 224A per D87-599-Transmitter site coordinates are located in Missouri, Zone 2.					
WRMX	LI 242C1	Murfreesboro	TN	179.89	79.6	133.0	46.89
36 05 07	86 26 22	DCN	100.000 kW	252 M			
		South Central Communications		BLH880311KB	940428		

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CERTIFICATION

State of Mississippi)
) ss.
County of Bolivar)

I, Larry G. Fuss, do hereby certify as follows:

- 1) I am a qualified and experienced broadcast consultant. I have been actively involved in the broadcast industry since 1972 and currently hold a lifetime FCC General Class Radio Telephone License (License No. PG-8-8450).
- 2) I have prepared numerous applications and rule making petitions which have been accepted for filing with the Federal Communications Commission.
- 3) I have been retained by Crossroads Broadcasting to prepare the attached Technical Exhibit.
- 4) The Technical Exhibit, of which this deposition is a part, and the measurements, calculations, studies and determinations upon which this report is based, were prepared by me or under my supervision and direction. All material contained therein is believed to be true and correct, to the best of my knowledge and belief.

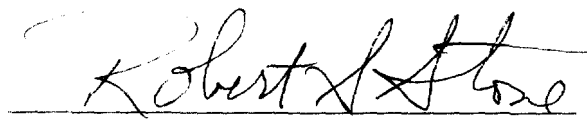
Larry G. Fuss
Larry G. Fuss
Affiant

August 19, 1995
Date

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Comments and Counterproposal of Crossroads Broadcasting has been served, this 12th day of September, 1995 upon all counsel or parties as listed below at interest in this cause by delivering a true and exact copy to the offices of said counsel or parties or by placing a copy in the United States mail addressed to said counsel or parties at his/her office, with sufficient postage to carry it to its destination, or by special overnight courier.

Dennis B. Corbett, Esq.
Leventhal, Senter & Lerman
2000 K Street, NW, Suite 600
Washington, DC 10006-1809


Robert S. Stone